

EXHIBIT 4



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MAY 30 2017

May 26, 2017

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VIA E-MAIL AND U.S. MAIL

Victor Otten
3620 Pacific Coast Highway
Suite 100
Torrance, CA 90505
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Re: Spencer, et al. v. Lunada Bay Boys, et al.

Dear Mr. Otten:

I attempted to reach you via phone today but was informed by your assistant that you were out of the office for the day, I would like to address several issues as outlined in your meet and confer letter dated May 25, 2017.

Plaintiffs allege Lee0000245 items 2212 to 2215 indicate SMS messages to Alan Johnston and Charlie Ferrara on June 30, 2016 "but the text messages have not been provided." Plaintiffs also allege that Lee 00000246 items 2252 to 2252 indicate SMS messages to Charlie Ferrara on July 20, 2016 "but the text messages have not been provided." As discussed during our in person meet and confer on February 1, 2017, nearly four months ago, none of the very limited number of text messages from or to the named defendants were recoverable from Mr. Lee's cell phone. Our forensic team was only able to determine whether a text message was sent or received from these individuals and could not recover the substance of the message itself because the texts were either too old and/or the data on the phone was outdated.

Plaintiffs also seek to be provided a copy of text messages on bates Lee 0000102 to Lee 0000132. Again, substantive text messages from named defendants and named parties requested by plaintiffs were unable to be recovered by the forensic team because the texts were either too old and/or the data on the phone was outdated. A significant portion of the documents are redacted because there are very limited text messages exchanged between Mr. Lee and named defendants. Redacted messages are between Mr. Lee and family members and friends unrelated to this mater.

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Further, the privilege log cannot be more specific without identifying the names and phone numbers of family members and friends of Sang Lee that are irrelevant to this action.

Very truly yours,

Tera A. Lutz

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TAL

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